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Date: January 31, 2000

To: Secretary

U.S. Surface Transportation Board

1925 K Street, N.W.

Washington, DC 20423-0001

Re: Finance Docket No. 33842

My company uses rail transportation heavily, handling an annual volume of over 2,000 carloads. We utilize all Class 1 North American railroads for our rail transportation needs.

We strongly support the STB's decision to carefully examine the BNSF/CN proposed control application; in fact, we urge the Board to deny the application at this time.

Without going into elaborate, repetitive detail or aping the words of any 'suggested' or 'possible' points to be made, we are **NOT IN FAVOR** of this 'mega-merger' for the following simple reason: We see no value in it; in fact, we believe this control change <u>could</u> do more harm than good by stimulating another round of "me too" from the other railroads.

In the past 10 years, we have supported all railroad merger/reconfiguration applications. We have seen some benefits, to be sure; however, we believe the cure is sometimes worse than the disease. Expected benefits from mergers clear back to BN-ATSF have *yet* to be fully realized, even though that merger was basically a slam-dunk. The UP-SP, while clearly necessary due to the pathetic condition of the SP, created horrible service disruptions which are just now fading from memory. The CN-IC affected us not at all; that is, we received NO benefit whatsoever. The ConRail breakup, while well overdue, created technological nightmares in spite of millions of unbudgeted dollars expended to avert that very result.

The shipping public is tired of supporting actions which advertise, but don't deliver. We as a company have routinely sent support letters whenever asked; we'll no longer do so. We've come to a point where we legitimately ask "What's in it for us?", then wait to see the benefits proven before we declare our support.

Respectfully;

James E. Allen

Rail Operations Manager

CC:

DLM VGC